MOD000818963

16D

Lynn Harrington
File

STATE OF MISSOURI

Mel Carnahan, Governor • David A. Shorr, Director

DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE DIRECTOR
P.O. Box 176 Jefferson City, MO 65102-0176 (314)751-4422
FAX (314)751-7627

RECEIVED
JUN 04 1993
PRMT SECTION

CERTIFIED MAIL # P 179 977 565
RETURN RECEIPT REQUESTED

May 27, 1993

Mr. Joe Haake
McDonnell Douglas Aerospace
Environmental and
Hazardous Materials Services
P.O. Box 516, Department 64C
Mail Code 1003377
St. Louis, MO 63166-0516

Dear Mr. Haake:

This is in response to your permit modification request for the Tract I facility, Permit # OSO 062284 002. In addition, the Missouri Department of Natural Resources (MDNR) would like to clarify the status of certain tank and container storage area closures.

Item 1. proposes a modified waste analysis plan. The modified waste analysis plan is dated November 10, 1991, and is identified as Revision No. 1. There is a mistake in Table C-1. SW-846 method 6010 for metals is not an atomic absorption method. Table C-1 needs to indicate that SW-846 method 6010 is conducted by inductively coupled plasma atomic emissions spectroscopy. With the correction noted above, MDNR approves of the modified waste analysis plan. The modified waste analysis plan is hereby incorporated as a permit condition.

Item 2. proposes a modified "Operations Manual for Hazardous Waste Storage Facilities, Tract I, Revised November 27, 1989." The only substantive change is the scope of operations. MDNR approves of the modified operations manual. The modified operations manual is hereby incorporated as a permit condition.

Item 3. proposes removal of certain storage tanks from permit status. Some of the storage tanks have been removed and others have been replaced.

Storage tanks H1 - H6 were removed and the area was closed in accordance with the closure plan. These tanks and the associated area are no longer part of the permit.

Storage tanks H12 - H16 were removed and replaced with three 850 gallon polyolefin storage tanks. The new tanks (designated as H12, H13 and H14) are used for less than ninety (90) day storage of waste nitric and hydrofluoric acids. The large quantity generator requirements of 40 CFR 262 as incorporated in 10 CSR 25-5.262 apply to these new tanks. The permit requirements that go beyond the applicable generator requirements do not apply if hazardous waste is not stored for greater than ninety (90) days in the tanks. However, McDonnell Douglas must close the containment area in accordance with the closure plan contained in the permit. The closure will consist of sampling and analysis of the containment area and the underlying soil and remedial action if there is contamination. The analytical parameters should include pH, nitrates, fluorides, heavy metals and any other hazardous constituents that may be present in this waste.

The "Hush House Waste Tank" was removed in 1989 after discovery of a leak. This underground storage tank was used for storage of waste jet fuel and waste hydraulic oil. Soil and groundwater in the area is contaminated with petroleum hydrocarbons. Groundwater remediation (soil vapor extraction) is on-going. MDNR's Environmental Services Program is providing oversight of the remediation efforts. The target levels for groundwater cleanup are 750 ppb BTEX and 10 ppm TPH. The target levels for soil cleanup are 1 ppm benzene, 5 ppm toluene, 10 ppm ethylbenzene, 10 ppm xylene and 200 ppm TPH. In the closure plan McDonnell Douglas stated that they would remove contaminated soil, if required, and dispose of it in an EPA approved disposal facility. McDonnell Douglas needs to evaluate the merits of soil excavation and submit a report to MDNR. The report should include a plan for soil excavation or a justification that shows that the current groundwater remediation plan will meet the cleanup target levels for soil and groundwater. This report must be submitted within sixty (60) days of receipt of this letter. A closure certification must be submitted after target levels have been achieved. The above discussion also applies to the following waste jet fuel storage tanks; Fuel Pit #3, Fuel Pit #4 and the Ramp Station 1 and 2 Waste Tank. Also, further remediation of these sites may be required by the HSWA corrective action program.

The "F-18 Silencer Waste Tank" was removed in 1992. This underground storage tank was used for storage of waste jet fuel and hydraulic oil. In April 1993 McDonnell Douglas submitted a closure certification and supporting documentation. According to the closure report, soil samples were taken from the excavated area and the results of analyses were below analytical detection limits for BTEX, TPH and TCLP lead. The closure certification is acceptable pending visual inspection of the area by MDNR.

The "Building 6 Waste Oil Tank" was removed and it appears that the area was closed in accordance with the closure plan. The closure certification is acceptable pending visual inspection by MDNR. The tank was replaced with a 375 gallon above ground tank. The new tank is subject to the waste oil regulations of 10 CSR 25-11.010 rather than the permit requirements.

Storage tanks H19 and H20 are used for less than ninety (90) day storage of waste sodium hydroxide from chemical milling of aluminum. The large quantity generator requirements of 40 CFR 262 as incorporated in 10 CSR 25-5.262 apply to these new tanks. The permit requirements that go beyond the applicable generator requirements do not apply if hazardous waste is not stored for greater than ninety (90) days in the tanks. However, McDonnell Douglas must close the containment area in accordance with the closure plan contained in the permit. The closure will consist of sampling and analysis of the containment area and the underlying soil, and remedial action if there is contamination. The analytical parameters should include pH, heavy metals and any other hazardous constituents that may be present in this waste.

The "Building 28 Waste Tank" was removed and replaced with a new underground storage tank. The new tank is used for less than ninety (90) day storage of waste jet fuel. The large quantity generator requirements of 40 CFR 262 as incorporated in 10 CSR 25-5.262 apply to this new tank. The permit requirements that go beyond the applicable generator requirements do not apply if hazardous waste is not stored for greater than ninety (90) days in the tank. However, McDonnell Douglas must close the area in accordance with the closure plan. The closure will consist of sampling and analyses of the soil beneath the underground storage tank, and remedial action if there is contamination. The analytical parameters should include BTEX and TPH.

The original "Area 2 Container Storage" building was closed and replaced by a prefabricated safety storage building. The new storage area is used for less than ninety (90) day storage of hazardous waste. The large quantity generator requirements of 40 CFR 262 as incorporated in 10 CSR 25-5.262 apply to the new storage area. The permit requirements that go beyond the applicable generator requirements do not apply if hazardous waste is not stored for greater than ninety (90) days in the storage area. McDonnell Douglas did not provide an adequate closure certification for the original Area 2 container storage building. The closure was not certified by an independent registered professional engineer. Both McDonnell Douglas and an independent registered professional engineer must certify that the facility has been closed in accordance with the specifications in the approved closure plan. McDonnell Douglas must submit a closure certification for Area 2 within sixty (60) days of receipt of this letter.

McDonnell Douglas indicates that Area 3 is no longer used for explosives waste storage. Before this area can be removed from permit status, McDonnell Douglas must close the area and provide a closure certification and supporting documentation in accordance with the specifications of the approved closure plan.

Item 5. proposes a modified inspection schedule which eliminates tanks and container storage areas that are no longer part of the permitted operations. MDNR approves of the new inspection schedule. The modified inspection schedule is hereby incorporated as a permit condition.

Item 6. proposes a modified contingency plan. The contingency plan was updated to reflect changes in emergency coordinators, internal spill/incident procedures, oil and hazardous substance storage and use sites, and facility and equipment changes. MDNR approves of the modified contingency plan. The modified contingency plan is hereby incorporated as a permit condition.

Item 7. is a name change. The Environmental Pollution Control Section of Plant Engineering has been changed to the Environmental and Hazardous Materials Services Department. MDNR acknowledges this name change.

In September 1990, McDonnell Douglas submitted a permit modification request relating to the toxicity characteristic leaching procedure. Because of the new TCLP test, several

hazardous wastes stored at the Tract I facility have a new TCLP waste code in addition to the previous waste code(s). Also, the waste analysis plan was changed to include the TCLP test. MDNR approves of the September 1990 permit modification request.

For the following hazardous waste management units, McDonnell Douglas must complete closure within one hundred eighty (180) days of receipt of this letter;

- Containment Area (Tanks H12 - H16)
- Containment Area (Tanks H19 and H20)
- Area 3 Container Storage Area
- Underlying Soil (Building 28 Waste Tank)

The closure certifications and supporting documentation for these areas must be submitted within sixty (60) days of completion of closure.

The closure certifications and the report regarding the merits of contaminated soil excavation should be submitted to Mr. Steve Jaques of the Hazardous Waste Program. Also, any questions about this letter should be directed to Mr. Jaques at (314) 751-3176.

Very truly yours,

DEPARTMENT OF NATURAL RESOURCES

David A. Shorr
Director

DAS:sjs

c: Lynn Harrington, P.E., U.S. EPA Region VII
Mr. Larry Coen, Environmental Services Program
St. Louis Regional Office